

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
EXP Group, LLC,

Plaintiff,

- against -

Los Compadres Products Corp.,
Josefa F. Perez and Pablo Perez,

Defendants.
-----X

Case No.: 07 CIV 9847 (PAC)

ECF CASE

ORDER

This parties having submitted to the Court an Order enforcing the terms of the settlement between the parties to resolve this action,

NOW, IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

1. Immediately upon the entry of the Order, Defendant Josefa F. Perez may recover her passport, which she previously surrendered to the United States Marshall in connection with the Plaintiff's motion for contempt. *PR*

(1.) The United States Marshall is hereby authorized to release to Defendant Josefa F. Perez the passport that she previously surrendered.

Dated: New York, New York
April 8, 2008

By the Court:

Paul A. Crotty
Paul A. Crotty
United States District Court Judge



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March 31, 2008

VIA EMAIL Ovalles@nysd.uscourts.gov

Honorable Paul A. Crotty
United States District Judge
United States District Court
500 Pearl Street, Room 735
New York, New York 10007

Re: Exp Group, LLC v. Los Compadres
Products Corp. and Josefa F. Perez
Case No. 07 CV 9847 (PAC)

Dear Judge Crotty:

This firm is counsel for Defendants Los Compadres Products Corp. ("Los Compadres"), Josefa F. Perez and Pablo Perez in the above referenced matter. As your Honor is aware, this matter was recently settled on the record and an order enforcing the settlement terms and a judgment embodying the settlement have been submitted for your Honor's signature.

By letter dated March 27, 2008, I wrote to Plaintiff's counsel and requested that upon the docketing of the order and the judgment, Plaintiff stipulate to allow Ms. Perez to recover her passport, which is being held by the United States Marshall. By letter dated March 28, 2008, Plaintiff's counsel advised me that he could not consent to my request because "the bond and the passport secure that obligation." (Copies of the letters are annexed hereto.)

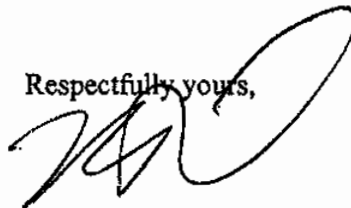
We write to request that your Honor authorize the release of Ms. Perez' passport. Under the proposed order enforcing the settlement terms, the bond previously filed on behalf of the Defendants fully secures the \$50,000.00 to be paid to Plaintiff under paragraphs "1" and "2" of the order. If Plaintiff's position is upheld, Ms. Perez will be prevented from recovering her passport until in or about November 2009, when the final installment under paragraph "2" of the order comes due. Plaintiff's position is entirely punitive and finds no support in the law, the record or the order.

Honorable Paul A. Crotty
United States District Judge
March 31, 2008
Page 2

Ms. Perez surrendered her passport to secure her attendance at the conferences and hearings held by this Court with respect to Plaintiff's motion for contempt. Now that the contempt motion and all other matters relative to this action have been resolved via settlement, Ms. Perez is entitled to recover her passport.

Enclosed please find an order consistent with the foregoing. We respectfully request that your Honor sign the order.

Respectfully yours,

A handwritten signature in black ink, appearing to be 'MJC', written over the closing 'Respectfully yours,'.

Marc J. Weingard

MJW:kg
Enclosure

cc: VIA FACSIMILE TRANSMITTAL
(212) 619-3626
Paul T. Gentile, Esq.
Gentile & Dickler, LLP
Attorney for Plaintiff

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PAGE 02/02

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March 28, 2008

VIA FACSIMILE 516-877-2460
AND REGULAR MAIL

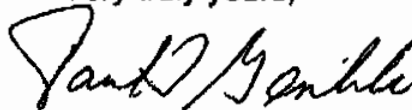
Marc J. Weingard, Esq.
Weinberg, Gross & Pergament, LLP
400 Garden City Plaza, Suite 403
Garden City, NY 11530

Re: EXP Group, LLC. v. Los Compadres Products Corp. and
Josefa F. Perez; Case No.: 07 cv 9847

Dear Marc:

Regrettably, I cannot consent to the return of Ms. Perez' passport prior to the payment of the \$50,000.00 settlement. As you know, the bond and the passport secure that obligation.

Very truly yours,



Paul T. Gentile

PTG:fm